

White & Case LLP
701 Thirteenth Street, NW
Washington, DC 20005

1 Christopher M. Curran (*pro hac vice*)

2 ccurran@whitecase.com

3 Lucius B. Lau (*pro hac vice*)

4 alau@whitecase.com

5 Dana E. Foster (*pro hac vice*)

6 defoster@whitecase.com

7 White & Case LLP

8 701 Thirteenth Street, N.W.

9 Washington, DC 20005

10 Telephone: (202) 626-3600

11 Facsimile: (202) 639-9355

12 *Counsel to Defendants Toshiba Corporation,*

13 *Toshiba America, Inc.,*

14 *Toshiba America Consumer Products, LLC,*

15 *Toshiba America Information Systems, Inc.,*

16 *and Toshiba America Electronic Components, Inc.*

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 (SAN FRANCISCO DIVISION)

20 IN RE: CATHODE RAY TUBE (CRT)
21 ANTITRUST LITIGATION

Case No. 07-5944 SC
MDL No. 1917

22 This Document Relates To:

23 *Sharp Electronics Corp., et al. v. Hitachi*
24 *Ltd., et al., Case No. 13-cv-1173*

25 *Sharp Electronics Corp., et al. v.*
26 *Koninklijke Philips Elecs., N.V., et al.,*
27 *Case No. 13-cv-2776*

**DECLARATION OF
LUCIUS B. LAU IN SUPPORT OF
REPLY MEMORANDUM IN
SUPPORT OF DEFENDANTS'
JOINT MOTION *IN LIMINE* NO. 9
TO EXCLUDE CERTAIN EXPERT
TESTIMONY OF JERRY A.
HAUSMAN**

28
DECLARATION OF
LUCIUS B. LAU IN SUPPORT OF REPLY MEMORANDUM IN SUPPORT OF DEFENDANTS' JOINT
MOTION *IN LIMINE* NO. 9 TO EXCLUDE CERTAIN EXPERT TESTIMONY OF JERRY A. HAUSMAN
Case No. 07-5944-SC, MDL No. 1917

1 I, Lucius B. Lau, hereby declare as follows:

2 1. I am an attorney with the law firm of White & Case LLP, counsel for
3 Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Consumer
4 Products, LLC, Toshiba America Information Systems, Inc., and Toshiba America Electronic
5 Components, Inc. (collectively, the "Toshiba Defendants").

6 2. I submit this declaration in support of the Reply Memorandum in Support of
7 Defendants' Joint Motion *In Limine* No. 9 to Exclude Certain Expert Testimony of Jerry A.
8 Hausman. Except for those matters stated on information and belief, which I believe to be
9 true, I have personal knowledge of the facts stated herein, and I could and would competently
10 testify thereto if called as a witness.

11 3. As of February 26, 2014, sixty-two (62) depositions of current or former
12 employees of Defendants had taken place in the MDL.

13
14 I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing is true and correct.

16 Executed this 6th day of March, 2015, in Washington, D.C.

17
18
19
20
21
22
23
24
25
26
27
28


Lucius B. Lau